

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHESTER TSANG, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO  
ZHU, YONGGANG SHAO, GANG WANG,  
JACK LAI, and QUQUANG YAO,

Defendants.

No. 1:07-cv-08706 (JGK)

WEICHEN G. LUI, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO,  
YONGGANG SHAO, GANG WANG,  
LOUIS T. HSIEH, JACK LAI, NICOLA  
SARNO, YUEPENG WAN, RONQIANG  
CUI, PIETRO ROSSETTO, and QIQANG  
YAO,

Defendants.

No. 1:07-cv-08766 (JGK)

ISMAEL HALIDOU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LDK SOLAR CO., LTD., XIAOFENG  
PENG, XINGXUE TONG, LIANGBAO  
ZHU, YONGGANG SHAO, GANG WANG,  
LOUIS T. HSIEH, JACK LAI, NICOLA  
SARNO, YUEPENG WAN, and QIQANG  
YAO,

Defendants.

No. 1:07-cv-09745 (JGK)

**MOTION OF SHAHPOUR JAVIDZAD FOR APPOINTMENT AS LEAD PLAINTIFF,  
APPOINTMENT OF LEAD COUNSEL, AND CONSOLIDATION OF  
RELATED ACTIONS**

**TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

PLEASE TAKE NOTICE THAT SHAHPOUR JAVIDZAD (“Movant”) respectfully moves this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), for entry of an Order: (i) appointing Movant as Lead Plaintiff on behalf of himself and all others similarly situated who incurred a loss in their securities transactions from June 1, 2007 through October 8, 2007 (the “Class Period”) resulting from the decline in the value of the American Depository Receipts of LDK Solar Co. caused by the Defendants’ violations of the federal securities laws; (ii) appointing the law firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. (“Cohen Milstein”) to serve as Lead Counsel; and (iii) consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure.

This motion is supported by the accompanying Memorandum of Law, the accompanying Declaration of Matthew B. Kaplan and the exhibits annexed thereto, all of the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Movant respectfully requests that the Court: (1) appoint Movant as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act; (2) appoint Cohen Milstein as Lead Counsel for the class; (3) consolidate all pending related actions; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: December 10, 2007

Respectfully submitted,

COHEN, MILSTEIN, HAUSFELD  
& TOLL, P.L.L.C.

/s/ Catherine A. Torell  
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- and -

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*Attorneys for Movant and  
Proposed Lead Counsel for the Class*